



February 8, 2016

Pharmaceutical Working Group  
c/o Angelo J. Bellomo, REHS, QEP,  
Deputy Director for Health Protection  
5050 Commerce Drive  
Baldwin Park, CA 91706

Mr. Bellomo,

On behalf of the members of the Product Management Alliance (PMA), we appreciate the opportunity to express the Product Management Alliances' position on Los Angeles County's proposed EPR Pharmaceuticals and Sharps Ordinance.

My name is Kevin Canan, and I serve as the Executive Director of the PMA. By way of introduction, the PMA is a coalition comprised of trade associations and corporations that represent a broad array of products including pharmaceuticals. Our mission is to support market-based extended producer responsibility (EPR) efforts, as well as voluntary incentives for increased recovery of products.

PMA's members have long strived to voluntarily recover the products that they manufacture. The PMA understands and appreciates Los Angeles County's desire to seek ways to improve the recovery rates of pharmaceuticals and sharps. However, we believe that implementing the proposed ordinance will not address the county's goals of improving water quality and preventing the diversion of drugs for illicit use. Reviewing current programs for pharmaceuticals take back throughout the world demonstrates that none of them have been able to prove that they reduce the amount of drugs in the environment<sup>1</sup>. In fact, the most effective way to reduce pharmaceuticals in the environment is through wastewater treatment.<sup>2</sup>

The ordinance is also confusing, duplicative and unnecessarily burdensome on consumers when there are currently, safe home disposal methods are already available. Ultimately the program would be costly, borne by taxpayers and consumers of Los Angeles County with questionable results at best.

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<sup>1</sup> Drug Take-Back Programs: What Will They Solve? Washington Policy Center available at <http://www.washingtonpolicy.org/library/doclib/DrugTakeBack.pdf>

<sup>2</sup> "Pharmaceutical and Personal Care Products in Municipal Wastewater and their Removal," Control of Toxics in Puget Sound, U.S. Environmental Protection Agency, Washington state Department of Ecology, and Puget Sound Partnership, Publication Number 10-03-004, January 2010, at [www.ecy.wa.gov/pubs/1003004.pdf](http://www.ecy.wa.gov/pubs/1003004.pdf)

Additional EPR programs set up a confusing and bureaucratic system of recovery for the residents of the County with similar types of products having very different take-back schemes simply confusing consumers.

PMA members and businesses utilize sophisticated programs in place that continue to increase the amounts of products recovered and recycled through voluntary initiatives. Today recovery rates are at very high, and they are continually striving to increase these numbers. The existence of these efforts illustrate that new mandates on producers are not necessary to reduce waste and increase recycling and the use of recycled content. Thus, we **oppose this proposal** and urge the County to takes steps to better educate County residents on proper disposal and safe storage of pharmaceuticals and sharps. This will yield the best results for reducing drug diversion, accidental poisonings, and avoid flushing of pharmaceuticals down the drain and into waterways.

The members of the PMA, and the industries they represent, recognize the desire of the public and policymakers for environmentally responsible business practices. That is why our member companies are voluntarily involved in waste recovery programs, and support recycling and take-back programs where it is economically and logistically feasible.

We hope to have a positive and constructive working relationship with you.

Sincerely,

A handwritten signature in blue ink, appearing to read 'K C Canan', with a stylized, flowing script.

Kevin C. Canan  
Executive Director

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CC: The Honorable Hilda L. Solis  
The Honorable Mark Ridley-Thomas  
The Honorable Sheila Kuehl  
The Honorable Don Knabe

The Honorable Michael D. Antonovich